REMARKS

Claims 1, 5-12, 14-19, and 21-30 are currently pending in the subject application and are presently under consideration. Claims 1, 9, 12, 17, 24, 27, and 30 have been amended as shown on pages 2-6 of the Reply. Claims 6, 7, 21, and 29 have been cancelled.

Applicant's representative thanks Examiner Bruckart for the courtesies extended during the telephonic interview conducted on September 4, 2008. The participants reviewed the proposed claim amendments, and the Examiner indicated aspects of the claims that he believed would benefit from addition clarifying amendments. These suggestions have been incorporated in the amended claim set herein.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 1, 5-7, 9-10, 12, 15-21, 24-25, and 27-30 Under 35 U.S.C. §102(b)

Claims 1, 5-7, 9-10, 12, 15-21, 24-25, and 27-30 stand rejected under 35 U.S.C. §102(b) as being anticipated by McBride (RDF Primer by W3C Draft). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. McBride does not teach or suggest each and every feature set forth in the subject claims.

> For a prior art reference to anticipate, 35 U.S.C. §102 requires that "each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (*quoting Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

The subject claims relate to identification of class information using a Uniform Resource Identifier (URI). The URI can include at least one placeholder substituted for the name of a specific resource or instance of the class, resulting in a URI template. Processing this URI template can return schema information for the identified class without returning a specific instance of the class. Moreover, replacing the placeholder in the URI with the name of a specific resource or class instance can identify and return the specific resource. In particular, amended independent claim 1 recites, *a class identifier that uniquely represents the class of resources to which the abstract or physical resource is associated, the class identifier is a uniform resource*

identifier (URI) that uses a single-character placeholder in place of a name of a specific resource of the class and ***is used to retrieve probe information for the class of resources without retrieving a probe of a particular instance of the abstract or physical resource,*** *wherein* ***the class identifier is converted to a specific identifier when the placeholder is replaced with the name of a specific instance of the abstract or physical resource.***

McBride does not disclose a URI having these characteristics. McBride presents a discussion of Resource Description Framework (RDF) language, which is used to represent information about Web Resources. With regard to retrieval of class information, the Examiner indicates a portion of McBride relating to rss readers, which make content at a web site available to subscribers without the need to visit the site with their browsers. However, these rss readers are not described as retrieving information for a *resource class*. Rather, the rss readers are designed to retrieve web content for display on a subscriber's browser. This retrieved content is not described as being a member of a class of resources, and consequently information regarding such a class cannot be retrieved in connection with the cited rss readers.

The Examiner also notes McBride's use of the xmlns:rdf statement in line three of Example 8, which terminates in a pound (#) character that, when substituted with a defined identifier for a particular member of an RDF container, identifies that particular member. However, as discussed in section 3.1 of McBride, this xmlns:rdf statement declares a *namespace* identified by the indicated URI reference (or URIref). This namespace declaration merely specifies that the tags in the XML content that makes up an RDF definition are part of the namespace defined by the URIref. However, while the addition of a member identifier to this namespace URIref can identify a particular member of an RDF container, the namespace URIref itself, without the specific object identifier, does not facilitate retrieval of information relating to a *class to which a resource belongs*. As such, the indicated xmlns:rdf declarations cited by the Examiner are in no way equivalent to the class identifiers disclosed in amended independent claim 1. The subject class identifiers can facilitate retrieval of information relating to a class of resources *without retrieving a specific resource instance* when a placeholder is used instead of a resource instance name, and can also facilitate retrieval of a *specific resource instance* when the placeholder is substituted with an instance identifier. The xmlns:rdf statements discussed in McBride do not teach or suggest such a class identifier.

Similarly, amended independent claim 12 recites, *a URI that uniquely represents the resource class and includes at least one single-character placeholder in place of a name of specific resource within the class,* ***the URI facilitating retrieval of probe information for the resource class without retrieval of a specific instance of a resource within the class,*** *wherein the URI representing the resource class is* ***converted to a specific resource identifier when the at least one placeholder is replaced with the name of a specific resource***, and as already discussed, McBride does not teach or suggest a URI having these capabilities.

Likewise, amended independent claim 17 recites, *processing the URI to retrieve management information associated with the resource class without retrieving an instance of the specific abstract or physical resource; converting the URI of the resource class to a URI for a specific resource by replacing the at least one placeholder with a specific instance name.* McBride does not disclose utilizing a placeholder in a URI to retrieve class-level management information for the class, or replacing this placeholder with a specific instance name to convert the URI to a specific resource identifier, as discussed *supra*.

Amended independent claim 24 recites, *processing the URI to return data representative of the class without returning a specific resource; substituting the at least one single-character placeholder with the name of a specific resource; and processing the modified URI to return information representative of a specific resource.* As discussed above, McBride does not disclose retrieving class-level data using a URI having a placeholder instead of a specific resource identifier, and also utilizing the URI to retrieve information for a specific resource by replacing the placeholder with a resource name.

Amended independent claim 27 recites, *uniquely associating a URI with a resource class, the URI uses at least one single-character placeholder in place of a name of a specific resource;* ***processing the URI to return data representative of the resource class without returning a specific resource****; modifying the URI to replace the at least one placeholder with a name of a specific resource in the class of resources****; processing the modified URI to the named resource.*** McBride does not teach or suggest these aspects, as already discussed.

In addition to indentifying classes and instances within the classes, as well as retrieving probe data for both, the subject claims also teach that the disclosed URIs can be used to pass values to methods associated with class instances. To this end, a URI template can include placeholders representing an instance name and a value to be assigned to the named instance,

such that substituting each placeholder with a respective instance and value facilitates passing the value to the named instance. In particular, amended independent claim 27 further recites, *employing at least two placeholders in the URI to pass values to a method associated with an instance of a specific resource in the class of resources, a first of the at least two placeholders represents the name of the specific resource and a second of the at least two placeholders represents a new value for a parameter associated with the specific resource.* Asserting that McBride teaches this method of passing parameters, the Examiner indicates Figure 5 of that reference, which is an RDF graph illustrating the breakdown of address information into components. However, this figure merely illustrates how an address is broken down into its component elements for storage in an RDF environment. This segmentation of data does not involve passing values to a method associated with a resource, much less doing so using placeholders in a URI as disclosed in amended independent claim 27.

Also, independent claim 30 recites, *a class identifier that uniquely represents the class of resources to which the abstract or physical resource is associated, the class identifier includes a single-character placeholder in place of a specific resource name and* ***facilitates retrieval of probe information for the class of resources without retrieval of a specific instance of a resource within the class****, wherein* ***the class identifier is converted to a specific resource identifier by replacing the placeholder with a name of a specific resource.*** McBride does not disclose such a class identifier, as discussed *supra*.

In view of at least the foregoing, it is respectfully submitted that McBride does not teach or suggest each and every feature of amended independent claims 1, 12, 17, 24, 27, and 30 (and all claims depending there from), and as such fails to anticipate the subject invention. It is therefore respectfully requested that this rejection be withdrawn.

II. Rejection of Claim 11 Under 35 U.S.C. §103(a)

Claim 11 stands rejected under 35 U.S.C. §103(a) as being unpatentable over McBride (RDF Primer by W3C Draft) in view of Trossen (US 2004/0260819). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. McBride and Trossen, individually or in combination, do not teach or suggest all aspects of the subject claims.

> A factfinder should be aware, of course, of the distortion caused by hindsight bias and must be cautious of arguments reliant upon *ex post* reasoning. See *KSR v. Teleflex*, 550 U.S. ___, 127 S. Ct. 1727 (2007) citing Graham v. John Deere Co. of Kansas City, 383 U. S. 1, 36 (warning against a "temptation to read into the prior art the teachings of the invention in issue" and instructing courts to "'guard against slipping into the use of hindsight'" (*quoting Monroe Auto Equipment Co. v. Heckethorn Mfg. & Supply Co.*, 332 F. 2d 406, 412 (CA6 1964))).

In addition to the URI template features already discussed, the subject claims also disclose that a URI with placeholders can be used to return a list of running instances of an application associated with the URI. To this end, claim 11 recites, *the class identifier is configured and executed to return a list of all running instances of an associated application*. As conceded in the Office Action, McBride fails to disclose these features. The Examiner maintains that Trossen remedies this deficiency. Trossen relates to proxy-based filtering of unsolicited event subscriptions. Trossen's system includes a database of authorized subscribers, wherein groups of subscribers with a common domain can be identified using a partial URI containing a wildcard (*e.g.* sip:*@domain.com, where * is the wildcard). The Examiner continues to argue that this identification of subscribers using a wildcard anticipates using a class identifier to return a list of *running instances of an application* associated with the class. However, it is respectfully noted that identifying subscriber information residing in a database is not the same as identifying a list of *running instances of an application*. Identification of subscriber information as described in Trossen is essentially merely a database retrieval operation, while the list returned in accordance with claim 11 entails identification of all *running* instances of a particular application. Trossen does not contemplate performing this type of identification.

Moreover, independent claim 11 depends from amended independent claim 1, and Trossen fails to remedy the deficiencies of McBride with respect to retrieval of probe information for a class of resources without retrieving a probe of a particular resource instance, as disclosed in that independent claim. Specifically, the partial URI of Trossen does not return information relating to a *resource class*, but rather returns a list of specific subscribers retrieved from a database.

In view of at least the foregoing, it is respectfully submitted that McBride, alone or in combination with Trossen, does not teach or suggest each and every feature set forth in amended

independent claim 1 (or claim 11, which depends there from), and as such fails to make obvious the subject invention. It is therefore requested that this rejection be withdrawn.

III. Rejection of Claims 8, 14, 22, 23, and 26 Under 35 U.S.C. §103(a)

Claims 8, 14, 22, 23, and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over McBride (RDF Primer by W3C Draft) in view of T. Berners-Lee *et al.* (RFC 2396). However, claim 23 recites, *comprising employing at least two placeholders in the URI to pass values to a method associated with an instance, at least a first one of the at least two placeholders represents an instance name and at least a second of the at least two placeholders represents a new value for a parameter associated with the instance.* As conceded in the Office Action, McBride does not disclose such a technique for passing values to a method. The Examiner argues that T. Berners-Lee, *et al.* makes up this shortcoming. T. Berners-Lee, *et al.* is a primer on URI grammar and syntax. The Examiner cites the discussion of absolute and relative paths to a resource defined by a URI, noting in particular the net_path and abs_path segments. However, a URI having these absolute and relative path segments do not in any way suggest a URI having a first placeholder for an instance name and a second placeholder for a value that can be passed to a method associated with the instance. Indeed, the referenced portions of T. Berners-Lee, *et al.* do not discuss *passing* values in any way, but only discuss identification of a resource using absolute and relative path addressing. The cited reference therefore fails to teach such passing of data using the placeholder format disclosed in claim 23.

Furthermore, claim 8 depends from amended independent claim 1, claim 14 depends from amended independent claim 12, claims 22 and 23 depend from amended independent claim 17, and claim 26 depends from amended independent claim 24. With regard to these independent claims, T. Berners-Lee, *et al.* fails to remedy the deficiencies of McBride and Trossen with respect to retrieval of probe information for a class of resources without retrieving a probe of a particular resource instance.

In view of at least the foregoing, it is respectfully submitted that T. Berners-Lee, *et al.*, alone or in combination with McBride and Trossen, does not teach or suggest each and every feature of amended independent claims 1, 12, 17, and 24 (and all claims depending there from), and as such fails to make obvious the present invention. It is therefore requested that this rejection be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP521US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

AMIN, TUROCY & CALVIN, LLP

/Himanshu S. Amin/
Himanshu S. Amin
Reg. No. 40,894

AMIN, TUROCY & CALVIN, LLP
24TH Floor, National City Center
1900 E. 9TH Street
Cleveland, Ohio 44114
Telephone (216) 696-8730
Facsimile (216) 696-8731